

February 27, 2012

Submitted via email

Dave Woelfel
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, California 92501-3348

Subject: Basin Plan Amendments to Revise Recreation Standards for Inland Fresh Surface Waters in the Santa Ana Region

Dear Mr. Woelfel:

OC Public Works has actively supported and participated in the Stormwater Quality Standards Task Force (Task Force) since it was formed in 2003. After many years of effort it is gratifying to see the proposed Basin Plan Amendments to revise recreation standards for inland fresh surface waters in the Santa Ana Region being considered for adoption. We support the proposed revisions as an appropriate programmatic approach for recreation standards.

The Task Force process included a wide range of stakeholders, allowing important issues underlying water quality criteria for recreation in fresh waters to receive much greater in-depth attention than would otherwise be possible. The Task Force also collected extensive data, conducted comprehensive evaluations of the science underlying water quality criteria for bacteria, reviewed the ability of the region's water bodies to support swimming and other recreational uses, and considered a wide range of potential implementation options. The resulting proposed Basin Plan Amendments, as a result of this intensive effort, will help assure that human health is protected within our region and that public resources will be expended reasonably and fairly.

The Basin Plan Amendments will update the region's water quality objectives for indicator bacteria to conform with USEPA's recommended criteria, and incorporate a narrative objective to assure that waste discharges do not contain human pathogens at levels that will increase the risk of illness. The proposed changes also recognize that some waters are commonly used for swimming and other recreational activities, while others are used infrequently, if at all. Finally, the proposed amendments acknowledge that recreational activities are unsafe in some streams during wet weather and regulate those streams accordingly. This latter factor is particularly important for our organization which manages flood control facilities.

The engagement of Santa Ana Regional Board staff in the Task Force was vital for the success of the collaborative basin planning effort and we commend the Board and its staff for this level of involvement. This comprehensive effort has established a firm scientific foundation for much-needed changes to the Region's Basin Plan and has done so in a manner that is open and transparent.

Please contact me at (714) 955-0630 if you require additional information.

Very truly yours,



Chris Crompton, Manager
Environmental Resources